

Ainsworth Declaration Exhibit D

THE HONORABLE JAMES L. ROBART

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FRED and KATHLEEN STARK, a married
couple,

Plaintiffs,

v.

THE SEATTLE SEAHAWKS, FOOTBALL
NORTHWEST, LLC, a Washington limited
liability company, FIRST & GOAL, INC., a
Washington corporation, THE WASHINGTON
STATE PUBLIC STADIUM AUTHORITY, a
Washington municipal corporation, and
LORRAINE HINE, in her capacity as chair of
the Washington State Public Stadium Authority
board of directors,

Defendants.

Case No. CV06 1719 JLR

DEFENDANT WASHINGTON STATE
PUBLIC STADIUM AUTHORITY'S
RESPONSE TO PLAINTIFF'S FIRST
INTERROGATORIES AND
REQUESTS FOR PRODUCTION

GENERAL RESPONSES AND OBJECTIONS

1. Defendant Washington State Public Stadium Authority ("PSA") objects to
producing any documents protected by the attorney-client privilege, work-product doctrine, or
joint interest or joint defense privileges.

2. PSA objects to producing any documents not within their possession, custody or
control.

3. PSA objects to producing any documents that have been previously produced in
connection with this proceeding.

4. PSA objects to any instruction in the Plaintiffs' First Interrogatories and Requests
for Production which imposes any obligation beyond that provided in the Federal Rules of Civil
Procedure.

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PLAINTIFF'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION

Case No. CV 6-1719

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Telephone 503-228-2525

5. This response is made without in any way waiving or intending to waive (a) the right to object on grounds of competence, privilege, relevance, materiality or on any other ground, to the use of any such information, for any purpose in whole or in part, in any subsequent step or proceeding in this action or any other action; and (b) the right to object on any and all grounds, at any time, to any other discovery procedure involving or relating to the subject matter of this request.

6. Documents will be made available for inspection and copying at the offices of Ball Janik LLP at a mutually convenient time, or copied and mailed to plaintiffs at plaintiffs' request and at plaintiffs' cost.

7. A statement in the responses to requests for production below that documents will be produced does not mean that PSA has responsive documents in its possession, custody or control, just that any documents that do exist will be produced.

INTERROGATORIES

INTERROGATORY NO. 2: Please identify each person partly or wholly responsible for establishing, creating, enforcing, implementing, or overseeing the policies and procedures relating to security at Qwest Field.

ANSWER: PSA lacks sufficient information to respond to this Interrogatory, other than to state that these persons must be employees of First & Goal, Inc. (FGI) and/or the National Football League ("NFL").

INTERROGATORY NO. 3: Please describe in detail the policies and procedures in effect at Qwest Field relating to security, terrorist attacks, threats of terrorist attacks, the safety of workers, and/or the safety of Patrons.

ANSWER: Objection, vague and overbroad to the extent the request could be construed to seek policies regarding construction activities. PSA further responds that it lacks detailed information sufficient to respond to this Interrogatory, other than to state that there is a practice by FGI of limited pat-down searches at NFL games and possibly other events, including one

1 college football game known to PSA, the September 17, 2005 WSU football game. PSA is also
 2 aware that certain policies and procedures relating to event security have been described in a
 3 Qwest Field Event Staff Handbook and on the Quest Field website, both of which are believed to
 4 have been produced by FGI. These policies or procedures are not those of PSA. PSA has no
 5 policies or procedures of its own relating to event security.

6 **INTERROGATORY NO. 4:** Please describe your involvement, if any, in the creation,
 7 development, institution, enforcement, or implementation of the policy or procedure requiring
 8 “pat-down” searches of individuals attending Seahawks games at Qwest Field.

9 **ANSWER:** None.

10 **INTERROGATORY NO. 5:** Please describe any policies or procedures relating to
 11 conducting “pat-down” searches, bag searches, metal detection devices, explosive-sniffing dogs,
 12 or other similar security measures for events other than Seahawks games at Qwest Field.

13 **ANSWER:** PSA lacks information sufficient to respond to this Interrogatory, other than
 14 to state that limited pat-downs occurred before admission to at least one college football game,
 15 the September 17, 2005 WSU football game. PSA is also aware that certain policies and
 16 procedures relating to event security have been described in a Qwest Field Event Staff Handbook
 17 and on the Quest Field website, both of which are believed to have been produced by FGI.
 18 These policies or procedures are not those of PSA. PSA has no policies or procedures of its own
 19 relating to event security.

20 **INTERROGATORY NO. 6:** Please identify each Public Event which occurred at
 21 Qwest Field since July 2002.

22 **ANSWER:** Objection, burdensome and duplicative. Based on a reasonable
 23 investigation, PSA does not have a document which identifies all such Public Events.

24 **INTERROGATORY NO. 7:** For each event identified in response to Interrogatory No.
 25 6, please describe the Patron screening procedures employed, including but not limited to
 26 whether bag searches, pat-down searches, explosive-sniffing dogs, metal detection devices were

1 used on Patrons attending the event.

2 **ANSWER:** PSA lacks information sufficient to respond to this Interrogatory, other than
3 to state that there is a practice by FGI of limited pat-down searches at NFL games and that pat-
4 down searches occurred at the September 17, 2005 WSU football game.

5 **INTERROGATORY NO. 9:** Please identify any and every company, contractor, or
6 subcontractor that is providing, has provided, or with whom you have or have had a contractual
7 agreement to provide security services at Qwest Field, stating for each the specific services
8 provided.

9 **ANSWER:** PSA has no contractual agreement or arrangement for security services at
10 Qwest Field.

11 **INTERROGATORY NO. 11:** Please identify and describe all threats of terrorist or
12 other violent attacks, including but not limited to suicide bomb attacks, against Qwest Field or
13 Patrons or employees at Qwest Field of which you have been informed or of which you have
14 become aware since July 2002. Such descriptions shall include the date of the threat, the date on
15 which you became aware of such threat, the nature of the threat, and the source of your
16 information regarding such threat.

17 **ANSWER:** PSA was informed of and became aware of warnings regarding a potential
18 dirty bomb attack, as described in the email dated October 18, 2006, attached as Exhibit 1.

19 **INTERROGATORY NO. 14:** Are you aware of any specific instance in which Qwest
20 Field security personnel have discovered any explosive device or devices at Qwest Field through
21 "pat-down" searches or any other means? If so, please describe the facts and circumstances
22 surrounding such discovery.

23 **ANSWER:** No.

24 **INTERROGATORY NO. 15:** Please identify and describe any and all incidents or
25 reports of violence or threatened violence at Qwest Field of which you are aware which involved
26 the use of firearms, explosives, incendiary devices, weapons of mass destruction or other devices

1 capable of harming large numbers of people.

2 **ANSWER:** None are known to PSA, other than the “dirty bomb” warnings described
3 above.

4 **INTERROGATORY NO. 16:** Please identify and describe all incidents or reports of
5 violence or threatened violence at any stadium in which a National Football League team plays
6 of which you are aware which involved the use of firearms, explosives, incendiary devices,
7 weapons of mass destruction or other devices capable of harming large numbers of people.

8 **ANSWER:** See Answers to Interrogatories 3, 14 and 15.

9 **INTERROGATORY NO. 17:** For each incident, event, or threat identified in response
10 to Interrogatories 13, 14, 15 or 16, please describe with particularity your response or the
11 response of any of the defendants in this lawsuit or of the National Football League, if any, to
12 such incident, event, or threat.

13 **ANSWER:** PSA did not respond to the dirty bomb warning. PSA understands that
14 responses may have made by FGI and the NFL, but PSA lacks sufficient information to respond
15 with particularity as to what those responses were.

16 **INTERROGATORY NO. 18:** Please describe the nature and extent of your authority
17 relating to security measures at Qwest Field, including but not limited to conducting pat-down or
18 other searches of Patrons attending events at Qwest Field.

19 **ANSWER:** Pursuant to the terms of the Master Lease Agreement, FGI, not PSA, has the
20 exclusive power and authority to possess, operate and use Qwest Field, and this power includes
21 security operations.

22 **INTERROGATORY NO. 20:** Identify the date and from whom you first learned that
23 the NFL had adopted a policy requiring pat-down searches of all Patrons at NFL games. Identify
24 the date and from whom you first learned that the NFL’s pat-down policy would be implemented
25 at Qwest Field.

26 **ANSWER:** To the best of its knowledge, PSA learned of the NFL policy on pat-down

1 searches on or about September 28, 2005.

2 **INTERROGATORY NO. 21:** Please describe the various levels of security alert at
3 Qwest Field (i.e., "yellow", "orange", etc...) and, for each level, identify the specific time
4 periods (by date) during which each such alert level was in effect.

5 **ANSWER:** PSA lacks sufficient information to respond to this Interrogatory, other than
6 to state that it has a copy of a 2006 Qwest Field Event Staff Handbook, which contains a
7 description of levels that may have been in use in the 2006 football season. A copy of that
8 Handbook is attached as Exhibit 2. PSA had no role in producing this Handbook. PSA has
9 established no levels of security alert.

10 **INTERROGATORY NO. 22:** If there has ever been a change in the level of alert at
11 Qwest Field, please describe the reason for the change, identify the person who directed that the
12 alert level be changed, and identify each event or communication relied upon as a basis for that
13 change.

14 **ANSWER:** The answer to this Interrogatory is not known to PSA.

15 **INTERROGATORY NO. 24:** Explain why full-body pat-downs are not conducted at
16 Qwest Field and at other venues where NFL games are played.

17 **ANSWER:** The answer to this Interrogatory is not known to PSA.

18 **INTERROGATORY NO. 25:** Please identify the number of people arrested and the
19 number of people refused access to Qwest Field as a result of the pat-down screening at
20 Seahawks games.

21 **ANSWER:** The answer to this Interrogatory is not known to PSA.

22 **INTERROGATORY NO. 26:** Have the security screeners at Qwest Field ever found
23 any contraband as a result of the "pat-down" searches during the 2005 and 2006 seasons? If so,
24 describe the contraband and the action taken by the screeners upon finding such contraband.

25 **ANSWER:** Based on a September 30, 2005 letter from FGI, a copy of which is attached
26 as Exhibit 3, PSA understands that pat-downs have identified alcohol brought into the stadium,

1 as well as one handgun.

2 **INTERROGATORY NO. 27:** Who pays for security at Qwest Field? For each of the
3 2005 and 2006 seasons (including pre and post-season games), how much did it cost to have pat-
4 down screeners at Seahawks home games?

5 **ANSWER:** PSA does not pay for security at Qwest Field and lacks information
6 sufficient to respond.

7 **INTERROGATORY NO. 28:** Identify the number of Patrons who have complained
8 about the pat-down policy at Qwest Field. Please describe the procedure, if any, by which
9 security screeners conducting pat-downs handle and report such complaints.

10 **ANSWER:** Two Patrons have sent written complaints to PSA. PSA lacks information
11 as to the procedures for reporting complaints received by security screeners, who are not
12 employed by PSA.

13 **INTERROGATORY NO. 29:** Identify each Public Event, and the venue where that
14 event took or takes place, for which all patrons, to your knowledge, were or are subjected to an
15 upper body pat-down as a condition of entry.

16 **ANSWER:** PSA lacks precise information, other than its understanding that there is a
17 practice by FGI of limited pat-down searches at Seahawks' games and at least one college
18 football game, the September 17, 2005 WSU game.

19 **INTERROGATORY NO. 30:** Identify each Public Event, and the venue where that
20 event took or takes place, for which all patrons, to your knowledge, were or are subjected to a
21 full body pat-down as a condition of entry.

22 **ANSWER:** No such Event is known to PSA.

23 **INTERROGATORY NO. 31:** Identify all communications, and the participants to
24 those communications, relating to the impact or potential impact of increased security or the
25 implementation of the pat-down policy at Qwest Field or other NFL stadiums on any insurance
26 premiums for any policy for which a defendant or the NFL is a named insured.

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1 **ANSWER:** No such communications are known to PSA.

2 **INTERROGATORY NO. 35:** Please describe any revenue, rents, profits, profit-sharing
3 or other income you receive from First & Goal, Inc. or any other entity or person who uses or has
4 used Qwest Field.

5 **ANSWER:** Objection: vague. In lieu of a further response, pursuant to Federal Rule of
6 Civil Procedure 33(d), PSA identifies the Master Lease Agreement, as amended, a copy of which
7 is attached as Exhibit 4, and the Approval and Naming Rights Agreement, a copy of which is
8 attached as Exhibit 5.

9 **REQUESTS FOR PRODUCTION**

10 **REQUEST FOR PRODUCTION NO. 1:** Please produce all documents relating to
11 policies and procedures for security at Qwest Field since 2002, including but not limited to
12 policies and procedures for searching or screening patrons attending events at Qwest Field.

13 **RESPONSE:** Responsive non-privileged documents will be produced.

14 **REQUEST FOR PRODUCTION NO. 2:** Please produce all documents relating to
15 security, terrorist attacks, threats of terrorist attacks, the safety of workers, and/or the safety of
16 Patrons at Qwest Field.

17 **RESPONSE:** Objection, overbroad and vague to the extent the request asks for
18 documents regarding worker safety. Notwithstanding these objections, responsive non-
19 privileged documents regarding security during events will be produced.

20 **REQUEST FOR PRODUCTION NO. 3:** Please produce all documents, including
21 correspondence, relating to the creation, development, institution, enforcement, or
22 implementation of the policy or procedure requiring "pat-down" searches of individuals
23 attending Seahawks games at Qwest Field.

24 **RESPONSE:** Responsive non-privileged documents will be produced.

25 **REQUEST FOR PRODUCTION NO. 4:** Please produce all documents relating to
26 conducting "pat-down" searches, bag searches, metal detection devices, explosive-sniffing dogs,

1 or other similar security measures for events at Qwest Field.

2 **RESPONSE:** Responsive non-privileged documents will be produced.

3 **REQUEST FOR PRODUCTION NO. 5:** Please produce all documents relating to the
4 training, supervision, screening, or employment of individuals conducting customer screening
5 services for Patrons attending events at Qwest Field.

6 **RESPONSE:** Responsive non-privileged documents will be produced.

7 **REQUEST FOR PRODUCTION NO. 6:** Please produce all contracts or agreements
8 relating to any company, contractor, or subcontractor that is providing, has provided, or with
9 whom you have or have had a contractual agreement to provide security services at Qwest Field
10 identified in response to Interrogatory No. 9.

11 **RESPONSE:** Responsive non-privileged documents will be produced. Based on a
12 reasonable investigation, PSA believes it has no such documents.

13 **REQUEST FOR PRODUCTION NO. 7:** Please produce all documents relating to any
14 threats of terrorist or other violent attacks, including but not limited to suicide bomb attacks,
15 against Qwest Field or Patrons or employees at Qwest Field identified in response to
16 Interrogatory No. 11.

17 **RESPONSE:** Responsive non-privileged documents will be produced.

18 **REQUEST FOR PRODUCTION NO. 8:** Please produce all documents relating to any
19 specific instance of a planned or an attempted terrorist bomb attack at Qwest Field identified in
20 response to Interrogatory No. 13.

21 **RESPONSE:** Responsive non-privileged documents will be produced.

22 **REQUEST FOR PRODUCTION NO. 9:** Please produce all documents relating to any
23 specific instance in which Qwest Field security personnel have discovered any explosive device
24 or devices at Qwest Field through pat-down searches or any other means identified in response to
25 Interrogatory No. 14.

26 **RESPONSE:** Responsive non-privileged documents will be produced. Based on a

1 reasonable investigation, PSA believes it has no such documents.

2 **REQUEST FOR PRODUCTION NO. 10:** Please produce all documents relating to
3 any incidents or reports of violence or threatened violence at Qwest Field of which you are aware
4 which involved the use of firearms, explosives, incendiary devices, weapons of mass destruction
5 or other devices capable of harming large numbers of people identified in response to
6 Interrogatory No. 15.

7 **RESPONSE:** Responsive non-privileged documents will be produced.

8 **REQUEST FOR PRODUCTION NO. 11:** Please produce all contracts, agreements or
9 other documents relating to security requirements imposed upon or applicable to any person or
10 entity contracting to use Qwest Field for the purposes of holding sporting events or competitions,
11 concerts or other events open to the general public.

12 **RESPONSE:** Responsive non-privileged documents will be produced. Based on a
13 reasonable investigation, PSA believes it has no such documents.

14 **REQUEST FOR PRODUCTION NO. 12:** Please produce written reports containing
15 the information required to be included in such reports by F.R.C.P. 26 relating to any expert
16 whom you expect to call as a witness at trial, along with copies of all documents provided to
17 such experts to the extent such documents have not been produced in response to a Request for
18 Production herein.

19 **RESPONSE:** Responsive non-privileged documents will be produced.

20 **REQUEST FOR PRODUCTION NO. 13:** Please produce all documents relating to
21 any analysis, review, study, or consideration relating to the policy requiring pat-down searches of
22 patrons entering Qwest Field for Seahawks games.

23 **RESPONSE:** Responsive non-privileged documents will be produced. Based on a
24 reasonable investigation, PSA believes it has no such documents.

25 **REQUEST FOR PRODUCTION NO. 14:** Please produce all documents and
26 communications between or among you, First & Goal, Inc., Football Northwest, LLC or the

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1 National Football League, or any other person relating to this lawsuit or to the policy requiring
2 pat-down searches of Patrons entering Qwest Field for Seahawks games.

3 **RESPONSE:** Responsive non-privileged documents will be produced.

4 **REQUEST FOR PRODUCTION NO. 15:** Please produce all documents relating to
5 any analysis, review, study or consideration of alternative measures you have considered for
6 screening Patrons entering Qwest Field.

7 **RESPONSE:** Responsive non-privileged documents will be produced. Based on a
8 reasonable investigation, PSA believes it has no such documents.

9 **REQUEST FOR PRODUCTION NO. 16:** Please produce all documents relating to
10 any agreement between or among you, First & Goal, Inc., Football Northwest, LLC or the
11 National Football League, or any other person to indemnify, hold harmless, pay defense costs for
12 or otherwise pay any loss, judgment, or expenses you may suffer as a result of this lawsuit.

13 **RESPONSE:** Objection. Responsive non-privileged documents will be produced.

14 **REQUEST FOR PRODUCTION NO. 17:** Please produce all correspondence between
15 or among you and counsel for First & Goal, Inc., Football Northwest, LLC and/or the National
16 Football League.

17 **RESPONSE:** Objection, overbroad and burdensome to the extent the request seeks all
18 correspondence, regardless of whether the request relates to security issues. Responsive non-
19 privileged documents, if any, regarding security issues will be produced.

20 **REQUEST FOR PRODUCTION NO. 18:** Please produce all documents evidencing
21 training materials, training manuals, or other materials used to train personnel providing security
22 services at Qwest Field.

23 **RESPONSE:** Responsive non-privileged documents will be produced.

24 **REQUEST FOR PRODUCTION NO. 19:** Please provide all documents evidencing
25 any policies, procedures, requirements or practice for conducting background checks for any
26 personnel having access to Qwest Field, including but not limited to background checks for

1 employees of the Public Stadium Authority, First & Goal, Inc., Football Northwest, LLC, and the
2 National Football League.

3 **RESPONSE:** Responsive non-privileged documents will be produced.

4 **REQUEST FOR PRODUCTION NO. 20:** Please produce all videos, photographs, or
5 other media in your possession showing, documenting, or memorializing security screening
6 procedures at Qwest Field, including but not limited to procedures for searching Patrons entering
7 Qwest Field, procedures for searching employees entering Qwest Field, procedures for detecting
8 explosive devices and other weapons, and procedures to prevent unauthorized access to Qwest
9 Field.

10 **RESPONSE:** Responsive non-privileged documents will be produced. Based on a
11 reasonable investigation, PSA believes it has no such documents.

12 **REQUEST FOR PRODUCTION NO. 21:** Please provide documents evidencing the
13 cost of security measures taken to screen or search Patrons (or their bags or possessions) entering
14 Qwest Field for each year beginning in 2002.

15 **RESPONSE:** Responsive non-privileged documents will be produced. Based on a
16 reasonable investigation, PSA believes it has no such documents.

17 **REQUEST FOR PRODUCTION NO. 22:** Please provide all documents relating to
18 policies, procedures or practices to conduct background searches or other screening measures on
19 personnel who provide security services at Qwest Field.

20 **RESPONSE:** Responsive non-privileged documents will be produced.

21 **REQUEST FOR PRODUCTION NO. 23:** Please produce any and all contracts or
22 agreements between and/or among any of defendants, the NFL, and any third-party provider of
23 security services (including, but not limited to, Guardsmark and any other provider of security
24 consulting services) since 2002.

25 **RESPONSE:** Objection. The request is vague as to whether it is limited to contracts
26 dealing with security, which based upon reasonable investigation PSA believes it does not have,

1 or whether the request instead seeks all contracts between FGI and PSA, in which case the
2 request is overbroad and burdensome.

3 **REQUEST FOR PRODUCTION NO. 24:** Please produce any and all documents and
4 communications internal to, between and/or among any of the defendants, the NFL, and any
5 third-party provider of security services (including, but not limited to, Guardsmark and any other
6 provider of security consulting services) since 2002, relating to security at Qwest Field,
7 including but not limited to, internal and third-party security audits. This request applies not
8 only to documents and communications directed specifically to Qwest Field, but also to those
9 relating to NFL stadiums in general.

10 **RESPONSE:** Responsive non-privileged documents, if any, will be produced.

11 **REQUEST FOR PRODUCTION NO. 25:** Please produce any and all communications
12 internal to, between and/or among any of defendants, the NFL, and any third-party provider of
13 security services (including, but not limited to, Guardsmark and any other provider of security
14 consulting services) since 2002, relating to each specific terrorist attack that formed the basis for
15 implementation of the NFL mandated pat-down policy at Qwest Field.

16 **RESPONSE:** Responsive non-privileged documents will be produced.

17 **REQUEST FOR PRODUCTION NO. 26:** Please produce a list of Seahawks season
18 ticket prices for each season beginning with the 2002 season.

19 **RESPONSE:** Responsive non-privileged documents will be produced. Based on a
20 reasonable investigation, PSA believes it has no such documents.

21 **REQUEST FOR PRODUCTION NO. 27:** Please produce all documents relating to the
22 issue of Patrons bringing alcoholic beverages into Qwest Field or other NFL stadiums and/or the
23 resulting impact on sales of alcoholic beverages within such stadiums.

24 **RESPONSE:** Responsive non-privileged documents will be produced.

25 **REQUEST FOR PRODUCTION NO. 28:** Please produce a list of Seahawks season
26 ticket holders for the 2005 and 2006 seasons.

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1 **RESPONSE:** Responsive non-privileged documents will be produced. Based on a
2 reasonable investigation, PSA believes it has no such documents.

3 **REQUEST FOR PRODUCTION NO. 29:** Produce each insurance policy covering any
4 period between January 1, 2002 to the present on which any defendant or the NFL is a named
5 insured.

6 **RESPONSE:** Objection: vague, burdensome and overbroad. Without waiving its
7 objection, PSA will produce declaration pages of applicable policies of PSA.

8 **REQUEST FOR PRODUCTION NO. 30:** Please produce any and all contracts or
9 agreements between and/or among any defendants and/or the NFL.

10 **RESPONSE:** Objection: vague, burdensome and overbroad. PSA has already produced
11 the Master Lease Agreement, with all amendments. PSA believes that it has no other agreements
12 with FGI dealing with security, and that PSA has no agreements between the NFL and other
13 parties.

14 **REQUEST FOR PRODUCTION NO. 31:** Please produce a complete, executed copy
15 of the Master Lease, including all amendments thereto, between you and First & Goal, Inc.
16 relating to Qwest Field.

17 **RESPONSE:** Responsive non-privileged documents have already been produced.

18 **REQUEST FOR PRODUCTION NO. 32:** Please produce documents evidencing any
19 revenue, rents, profits, profit-sharing or other income you receive from First & Goal, Inc. or any
20 other entity or person who uses or has used Qwest Field since January 1, 2004.

21 **RESPONSE:** Objection: overbroad, burdensome and not calculated to lead to the
22 discovery of admissible evidence. Notwithstanding its objections, PSA will produce deposit
23 slips received from FGI since January 1, 2004, along with the Master Lease and the Naming
24 Rights Agreement.

25

26 **DATED:** March 19, 2007.

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Respectfully submitted,

By:

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Of Attorneys for Defendants The Washington
State Public Stadium Authority and Lorraine
Hine

ANSWERS and RESPONSES submitted this 19th day of March, 2007.

By:

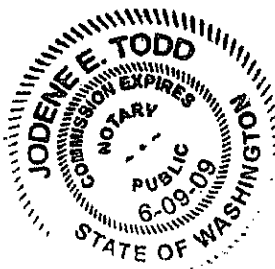
Ann Kawasaki Romero

STATE OF Washington)
COUNTY OF King) ss.

Ann Kawasaki Romero, being first duly sworn on oath, deposes and says:

That she is the Executive Director of defendant Washington State Public Stadium Authority, that she has read the foregoing Answers to Interrogatories and Responses to the Request for Production of Documents, knows the contents thereof and believes the same to be true.

SUBSCRIBED and SWORN to before me this 19th day of March, 2007.



Jodene E. Todd
Notary Public in and for the State of Washington
Residing at Mill Creek, WA
My commission expires 6/9/09

CERTIFICATE OF SERVICE

I hereby certify that, on the 19th day of March, 2007, I served a true and correct copy of the foregoing **DEFENDANT WASHINGTON STATE PUBLIC STADIUM AUTHORITY'S RESPONSE TO PLAINTIFF'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION**, by the method shown below, addressed to the following named persons at their last-known addresses on the date shown above:

Timothy G. Leyh, Esq.
Christopher T. Wion, Esq.
Danielson Harrigan Leyh & Tollefon LLP
999 Third Avenue, Suite 4400
Seattle, Washington 98104
Counsel for Plaintiffs


BY EMAIL AND U.S. MAIL

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Football Northwest LLC and First & Goal, Inc.

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Attorneys for Defendants The Washington State
Public Stadium Authority and Lorraine Hine

Exhibit 1

Jan. 5. 2007 7:15PM PAS

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Ann Kawasaki Romero

From: Fuller, Martha [MarthaF@Seahawks.com]
Sent: Wednesday, October 18, 2006 2:21 PM
To: Ann Kawasaki Romero
Subject: FW: original story...

More...

From: Pearson, Dave
Sent: Wednesday, October 18, 2006 1:53 PM
To: Ruskell, Tim; Leiweke, Tod; Rizzardini, John; Fuller, Martha; Wright, Gary
Cc: Lavender, Suzanne; Darrington, Susan; Schleck, Paul; Nank, Michael; Reinfeldt, Mike; Gammel, Lane; Barber, Julie
Subject: original story...

The following is the original story AP has sent me. To review, the league's response is: "The Department of Homeland Security has judged that the threat is not credible. Our stadiums are very well protected through the comprehensive security procedures we have in place, including secure facility perimeters, pat-downs, and bag searches."

####Please defer all inquiries to the league office and/or the department of homeland security.####

WASHINGTON (AP) — A Web site is claiming that seven NFL football stadiums will be hit with radiological dirty bombs this weekend, but the government on Wednesday expressed doubts about the threat.

¶ The warning, posted Oct. 12, was part of an ongoing Internet conversation titled "New Attack on America Be Afraid." It mentioned NFL stadiums in New York, Miami, Atlanta, Seattle, Houston, Oakland and Cleveland, where games are scheduled for this weekend.

¶ The Homeland Security Department alerted authorities and stadium owners in those cities, as well as the NFL, of the Web message but said the threat was being viewed "with strong skepticism." Homeland Security spokesman Russ Knocke said there was no intelligence that indicated such an attack was imminent, and that the alert was "out of an abundance of caution."

¶ "The department strongly encourages the public to continue to go about their plans, including attending events that involve large public gatherings such as football games," Knocke said.

¶ The FBI also expressed doubt about the threat.

¶ The nation's alert level remains at yellow, signaling an elevated risk of an attack. The threat level for airline flights is at orange, a higher level, where it has been since a foiled plot to bomb U.S.-bound commercial jets was revealed on Aug. 10.

¶

3:1

1/5/2007

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Page 1 of 3

PSA 000001

Jan 5 2007 7:15PM PAS

No 0709 P. 6 of 2

Ann Kawasaki Romero

From: Fuller, Martha [MarthaF@Seahawks.com]
Sent: Wednesday, October 18, 2006 1:49 PM
To: Ann Kawasaki Romero
Subject: FW: Talking points on stadium threat

FYI This is what kept me from the PVR meeting -- fortunately, the threat was determined to be not credible. Moment of alarm, now alleviated.

From: Pearson, Dave
Sent: Wednesday, October 18, 2006 1:21 PM
To: Ruskell, Tim; Leiweke, Tod; Wright, Gary; Rizzardini, John; Fuller, Martha
Cc: Lavender, Suzanne; Nank, Michael
Subject: FW: Talking points on stadium threat

For now, the Seahawks will say:

"We are still gathering information and defer all questions on this matter to either the nfl pr office or the department of homeland security"

From: Aiello, Greg [mailto:AielloG@NFL.com]
Sent: Wednesday, October 18, 2006 12:59 PM
To: Roberts, Reggie (NFL); Colangelo, Ron (NFL); Greene, Harvey (NFL); Bonsiewicz, Bill (NFL); Pearson, Dave; Taylor, Mike (NFL); Wyllie, Tony (NFL)
Subject: FW: Talking points on stadium threat

Gentlemen: Here's the statement we just issued -- "The Department of Homeland Security has judged that the threat is not credible. Our stadiums are very well protected through the comprehensive security procedures we have in place, including secure facility perimeters, pat-downs, and bag searches "

Below are talking points from the Department of Homeland Security.

-----Original Message-----

From: Whitworth, Kirk [mailto:Kirk.Whitworth@dhs.gov]
Sent: Wednesday, October 18, 2006 3:03 PM
To: McCarthy, Brian; Aiello, Greg
Cc: Knocke, William R
Subject: Talking points on stadium threat

Greg and Brian,

Thanks for talking with us today. Below are the talking points we intend to use, and Russ currently has a call into CNN.

Thanks, and let us know if there is anything else you need from us.

- DHS is monitoring reports of overseas allegations of pending "Dirty bomb" attacks on the US. DHS judges that the threat is not credible.

- While there is no credible intelligence indicating such attacks, out of an abundance of caution, DHS notified federal, state, local, and private sector partners about the threat, recommending that stadium and local law enforcement authorities remain vigilant.

1/5/2007

EXHIBIT 1
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PSA 000002

Jan 5 2007 7:15PM PAS

No. 0709 P. 7
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■ As we have in the past, we continue to share sensitive information with our partners at all levels to ensure they have the information they need to make the right decisions to protect their communities.

*Kirk Whitworth
Office of Public Affairs
Department of Homeland Security
Washington, DC
303-382-8462
c-202-680-3611*

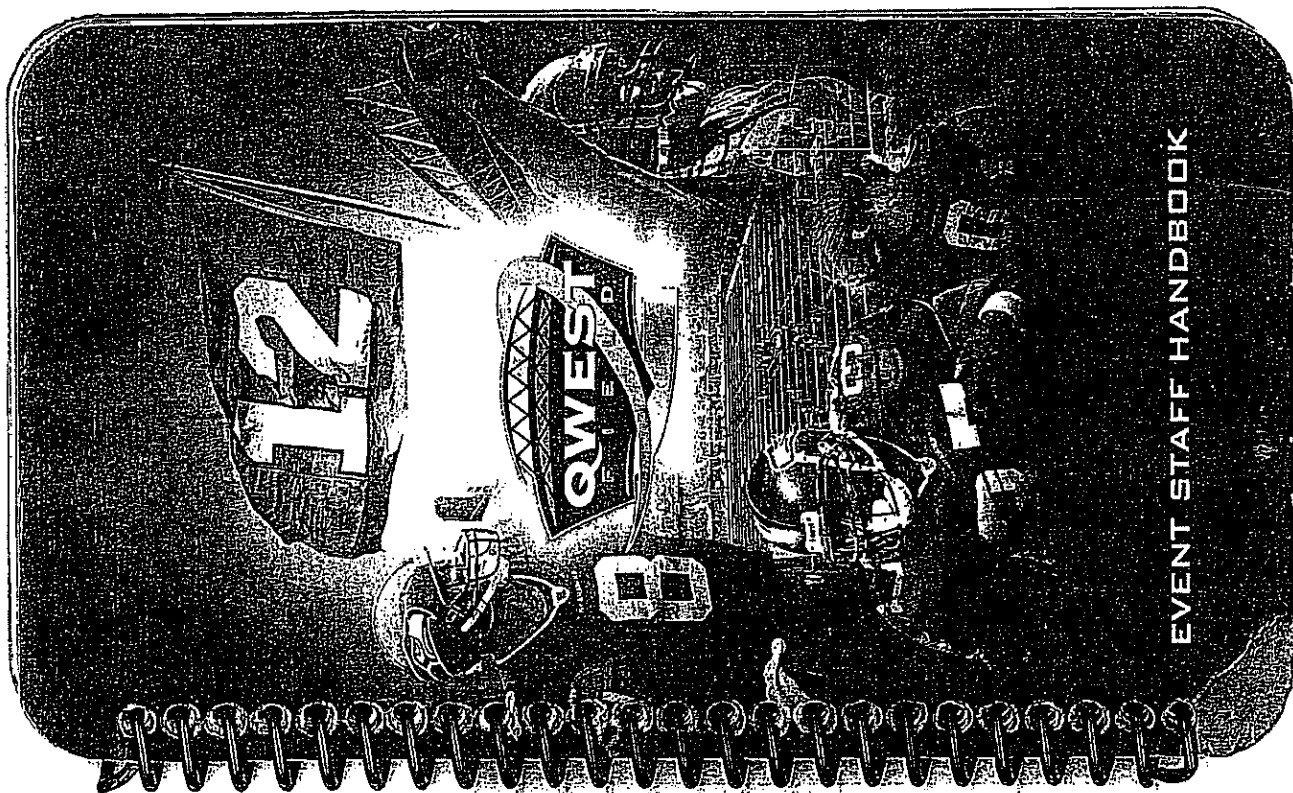
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PSA 000003

Exhibit 2

EXHIBIT 2
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PSA 000004

2006**SEAHAWK'S SCHEDULE****2006 PRESEASON**

★ Dallas Cowboys	Home	Aug. 12	7:00pm	KING
○ Indianapolis Colts	Away	Aug. 20	5:15pm	FBC
○ San Diego Chargers	Away	Aug. 26	8:00pm	KING
○ Oakland Raiders	Home	Aug. 31	7:00pm	KING

2006 REGULAR SEASON

○ Detroit Lions	Away	Sept. 10	10:40am	FOX
○ Arizona Cardinals	Home	Sept. 17	1:00pm	FOX
NY New York Giants	Home	Sept. 24	1:00pm	FOX
○ Chicago Bears	Away	Oct. 1	5:15pm	ABC
BYE		Oct. 8		
○ St. Louis Rams	Away	Oct. 15	10:00am	FOX
○ Minnesota Vikings	Home	Oct. 22	1:00pm	FOX
○ Kansas City Chiefs	Away	Oct. 29	10:00am	FOX
○ Oakland Raiders	Home	Nov. 6	5:30pm	ESPN
○ St. Louis Rams	Home	Nov. 12	1:00pm	FOX
○ San Francisco 49ers	Away	Nov. 19	1:05pm	FOX
○ Green Bay Packers	Home	Nov. 27	5:30pm	ESPN
○ Denver Broncos	Away	Dec. 3	1:15pm	FOX
○ Arizona Cardinals	Away	Dec. 10	1:05pm	FOX
○ San Francisco 49ers	Home	Dec. 14	5:05pm	NFL
○ San Diego Chargers	Home	Dec. 24	1:00pm	CBS
○ Tampa Bay Buccaneers	Away	Dec. 31	10:00am	FOX

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GUEST COMMUNICATION PROCESS

In speaking with our Guests, understand that the rules are simply a tool that we can use to make great fan experiences. Each of us here at Qwest Field is empowered to make their own judgment based on the individual situation with the goal of making great fan experiences. Follow these three steps for each situation and treat each individually.

1. Listen to the Guest
2. Use the Rules as a Guide
3. Follow Your Heart

When communicating with a guest always end a negative with a positive. Always deliver an alternative to the answer no. Don't just tell someone that they cannot do something, offer up an alternative or two that will satisfy everyone's needs.

We are all here for one reason, to pour our heart and soul into making the best fan experience possible here at Qwest Field. We also have a lot of fun ourselves in the process. The Qwest Field Way is the starting point to achieve our goals. Using this, your own judgment and the rules as a guide, you will always make a positive experience for our guests.

CONTACT INFORMATION

STADIUM ADDRESS
First and Gial, Inc.
800 Occidental Avenue South #100
Seattle, WA 98134

PHONE
877-FGI-HAWK
(877-364-4296)
Toll free every staff line

FAX
206/381-7357

INTERNET
www.qwestfield.com
www.seahawks.com

SECURITY COMMAND CENTER
(24 HOURS)

206/381-7510
x7510 from any Qwest Field house phone

2

THE QWEST FIELD WAY

We are all committed to making the best experiences for our fans at Qwest Field. Everyone in our organization from players to our sales team to the CEO to the Event Staff to the vice presidents and other managers are equally invested and responsible in this pursuit of service excellence to make Qwest Field the venue of choice. Together, we make Qwest Field the greatest place to experience an event in the world. It is up to us to share that great experience and the pride we have in this great facility with our fans each day.

The Qwest Field Way for Guest Service is a set of tools based around a philosophy of service excellence that is the foundation and motivation for everything that we do at Qwest Field.

3-KEYS TO GUEST SERVICE

In order of importance, the three keys are our most basic foundation behind our Guest Service decision-making process.

1. Safety
2. Fan Experience
3. Efficiency

Safety is our top concern in any situation. It even supersedes service in some cases, because in reality, a safe environment is a basic requirement for a positive fan experience. Utilize these keys in the order of importance in every decision-making situation.

MINIMUM GUIDELINES FOR GUEST SERVICE

These guidelines should be carried out by all staff at all times to all Guests of Qwest Field. We are here to have a good time and ensure our Guests do the same.

1. Greet and Thank Each Guest
2. Proactively Seek Guest Contact
3. Make Eye Contact and Smile
4. Display Appropriate Body Language
5. Maintain the Positive Fan Experience

PSA 000008

SEAHAWKS/FIRST & GOAL MANAGEMENT



Paul G. Allen
Chairman, Seattle Seahawks,
Football Northwest
and First & Goal, Inc.



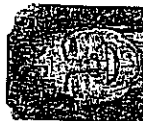
Tod Lewke
Chief Executive Officer



Tim Ruskell
President
of Football Operations



Mike Reinfeldt
Vice President
/Football Administration



Martha Fuller
Senior Vice President
and Chief Financial Officer



Beth Wojcik
Vice President
of Corporate Partnerships



Ruston Webster
Vice President/
Player Personnel



John Rizzardi
Senior Vice President
and Chief Marketing Officer



Mike Flood
Vice President/
Community Relations



Gary Wright
Vice President
Administration



Lance Lopes
Vice President
Legal Affairs



Paul Schieck
Assistant
General Manager



Steve Eckerson
Director of Sales
and Marketing



Dave Cronin
Director of
Event Operations



Scott Patrick
Vice President/
Partnership Development



Susan Darrington
Vice President,
Facility Operations
& Service



Mike McFaul
Director of
Facility Operations



David Young
Director of
Event Services



Kurt Shaffer
Director of
Technical Services

PSA 000009

OPERATIONAL POLICIES

ALCOHOL MANAGEMENT

Safety is the top priority of all Qwest Field staff. Likewise, alcohol management is the responsibility of all Qwest Field staff.

According to the Washington State Liquor Control Board, signs of intoxication include but are not limited to:

- a lack of physical coordination
- carelessness or clumsiness in actions
- unsteady walking
- slurred speech and/or talking extra loud

Under Washington State law, intoxicated persons may not be served alcohol. Notify your supervisor and Levy Restaurant vendors if you observe a fan that is overly intoxicated.

ANIMALS

Service animals or service animals in-training for guests with disabilities are welcome at the Stadium and Exhibition Center. The ADA recognizes any type of animal as a potential service animal. Guests are not required to show certification for their service animals.

AUTOGRAPHS / PHOTOGRAPHS

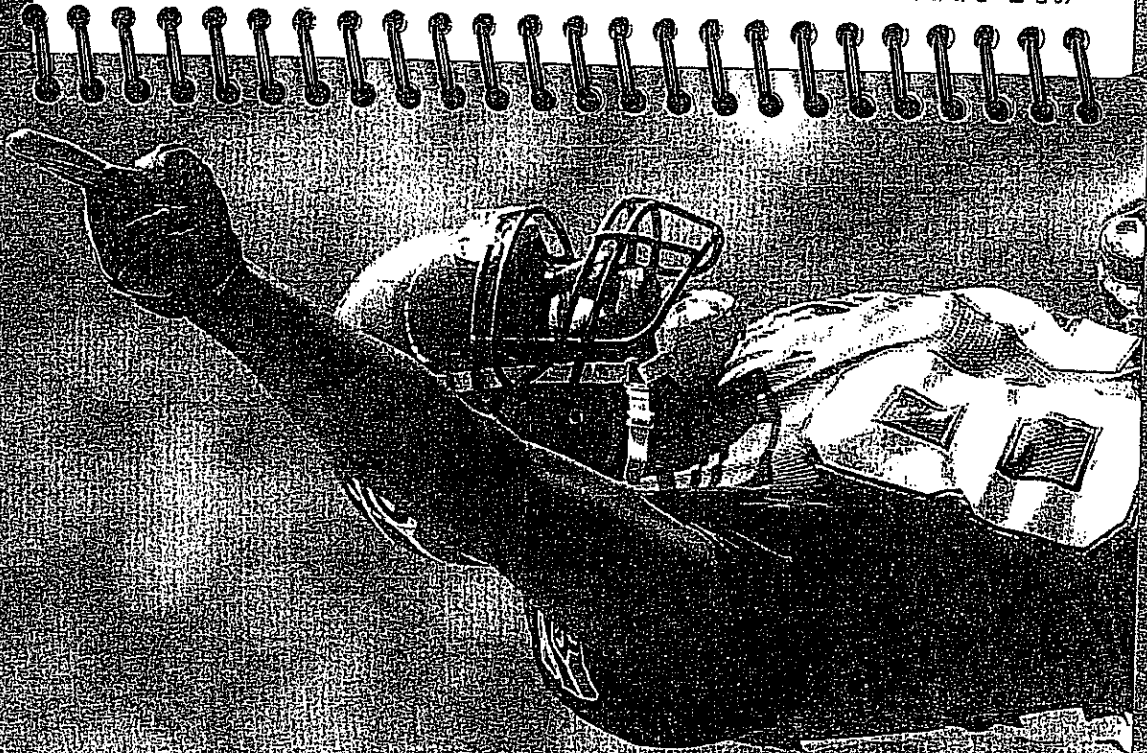
We welcome a number of celebrities and VIP fans to the stadium and exhibition center throughout the year. Qwest Field staff may not ask for photographs or autographs from any person while on duty. This includes athletes and other team personnel.

VIPs and celebrities like the rest of our Guests and coworkers are simply here to either work or enjoy their experience at Qwest Field. As such, they should be afforded the same accommodations as our other Guests while in our facility. Infractions on this policy are considered major violations of the basic Guest Service guidelines.

BAG CHECK / FAN SCREENING

All persons and bags entering Qwest Field are subject to inspection and/or search. There are two levels of fan screening corresponding to the current security threat level as assessed by the Qwest Field security department in consultation with the NFL and law enforcement authorities when appropriate.

Fan screening level will be communicated prior to each event. Security is dynamic and fan-screening Levels may change at any time during the game. The Stadium Control Room will announce any changes via radio during game day.



PSA 000010

Both levels of screening involve a visual inspection of fans as they enter and an inspection of all bags. In addition, the following screening actions will be taken according to the most current announced security threat level:

Yellow: Random upper torso pat down
Orange: Full body pat down of all guests

Refer to the Qwest Field fan guide section for details on prohibited items for Seahawks games and other large stadium events. Keep in mind that the prohibited item list may change for different events.

Employee Screening

Employee bags will be searched and tagged at the locker room entry on the East Access Road on gameday. All bags entering Qwest Field on gameday will be searched. In addition, Qwest Field reserves the right to inspect employee bags and lockers.

Forbidden Items

Must be taken back to the fan's car or otherwise left outside Qwest Field. We do not check forbidden items for storage inside Qwest Field.

Intoxicated Fans

Visibly intoxicated fans will be denied access to Qwest Field. If you observe the signs of intoxication in a fan, politely deny access to the building. Invite the fan to wait outside until the intoxication has subsided.

Qwest Field is a family environment. Intoxicated fans pose a safety risk to other fans and themselves. Contact a team captain, alcohol enforcement or the Stadium Control Room if you need assistance. See the section above on alcohol management at Qwest Field.

BALL IN STANDS

NFL rules state that any ball landing in the stands as a result of play must be returned to the playing field. Qwest Field staff should politely identify themselves and request the ball returned to the field of play.

Consult your supervisor for rules as they apply to other events such as soccer, lacrosse or other sporting matches.

CAMERAS AND CAMCORDERS

Personal still photography is permitted during Seahawks games and most other Qwest Field events. Flash photography, video cameras and support tools (such as tripods, large lens, etc.) are not allowed at Seahawks games and most other events.

The policy on use of camcorders and other professional-style recording equipment listed above will vary from event to event. Consult the event resource for guidelines for a specific event.

Qwest Field does not offer storage to cameras or other items not allowed into our facility. Please direct Guests to store these items in their car or elsewhere while inside Qwest Field and Qwest Field Event Center.

CLEARING AN EVENT

To maintain a safe environment, it is important to ensure that our fans exit our building safely and completely at the end of an event. Follow the fan exiting plan as outlined in the guidelines for your area. For other events and flat shows, follow the direction of your shift supervisor as outlined during the pre-shift briefing. Keep in mind that we remain polite and offer the best in Guest Service when clearing the building.

Building staff should never disrupt a conversation between exhibitors and/or show personnel and a guest when clearing a show. If appropriate for your area be sure to check all exterior doors to make sure they are secured and locked properly before leaving your post or area after a game or event.

CODE OF CONDUCT (FANS AND GUESTS)

We are committed to creating a safe, comfortable and enjoyable experience for all of our guests at Qwest Field and Qwest Field Event Center.

Our event staff will proactively seek out Guest contact to support an environment where Guests can enjoy the event experience free from the following behaviors:

- Foul / Abusive language or obscene gestures
- Intoxication or other signs of impairment related to alcohol consumption
- Displays of affection not appropriate in a public setting
- Any disruption to the progress of the event by guest's actions
- Obscene or indecent clothing
- Obscene or inappropriate signs or banners



PSA 000011